

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America  
 v.  
 David Arturo SERVELLON

Case No.

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 17, 2021 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

8 USC 1324

*Offense Description*

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet.

/S/Javier Medrano

*Complainant's signature*

Javier Medrano, Border Patrol Agent

*Printed name and title*

Sworn to before me and signed in my presence,

Date: October 19, 2021*Judge's signature*City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

In support of Criminal Complaint

**UNITED STATES OF AMERICA**

**CRIMINAL COMPLAINT**

**V.**

David Arturo SERVELLON

Case Number:

On October 17, 2021, Border Patrol Agents (BPAs) were working at the Laredo North Border Patrol Checkpoint, which is located on Interstate Highway 35 north of Laredo, Texas in Webb County. At approximately 1:50 p.m., a BPA was performing his immigration duties at the primary car lane when he observed a silver in color Toyota Camry move from the first car lane all the way over to the semi-truck lane and park for a short period of time. Multiple agents waved at the driver, David Arturo Servellon, to proceed forward and enter the primary car lane for inspection. A BPA greeted all occupants, while other BPAs conducted an immigration inspection on the front and rear passengers. BPAs determined that all passengers did not possess any immigration documents that would allow them to enter or remain in the United States legally. All subjects were placed under arrest and escorted inside the checkpoint for further processing.

Once inside the checkpoint, an immigration inspection was performed on David Arturo Servellon, and it was determined he was a United States citizen.

David Arturo Servellon was read his Miranda rights via service form I-214. Servellon acknowledged his rights and was willing to provide a statement without an attorney present. Servellon stated he drove down from Houston, Texas yesterday (October 16, 2021) and he stayed in his vehicle over night until an unknown male contacted him today (October 17, 2021) around noon. Servellon stated he drove to a Whataburger parking lot and met with an unknown person. He stated he parked next to a white vehicle. He observed four subjects exit the white vehicle and enter his vehicle. Servellon stated before arriving to the checkpoint, the four subjects started praying. Servellon stated that he was going to get paid \$3,000 United States Dollars (USD) to drop off the subjects at an unknown location in San Antonio, Texas. He stated he had knowledge of all subjects being illegally present in the United States.

Gualberto SALINAS-Carmona is a citizen of Mexico, serving as a material witness in the case against David Arturo Servellon. SALINAS-Carmona stated his family made the arrangements for him and his wife to be smuggled into the United States for \$2,500 USD. SALINAS-Carmona stated their destination was San Antonio, Texas. SALINAS-Carmona stated they made an illegal entry into the United States by wading across the Rio Grande River on October 13, 2021, near Laredo, Texas. They walked for an approximately an hour until an unknown man picked them up. SALINAS-Carmona stated the unknown man took them to a hotel where he stayed in a room with his wife. SALINAS-Carmona stated today (October 17, 2021) an unknown man picked them up and took them to a parking lot where the gray vehicle was parked. SALINAS-Carmona stated when he got inside the gray vehicle, he observed two female passengers and a male driver inside. SALINAS-Carmona described the driver as a tall and chubby man with a beard. SALINAS-Carmona stated he, and his wife sat in the rear, behind the passenger seat. He stated they did not make any stops and drove straight towards the checkpoint. He stated as they arrived at the checkpoint, the driver came to a complete stop and appeared to be in shock. SALINAS-Carmona stated he thought the checkpoint was a gas station until he observed BPAs waving at the vehicle. He stated he believed Servellon knew they were illegally present in the United States.

SUBSCRIBED and SWORN to before me on

19th

day of

October, 2021

\_\_\_\_\_  
Signature of Judicial Officer

/S/ Medrano, Javier    Border Patrol Agent

\_\_\_\_\_  
Signature of Complainant